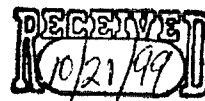




October 20, 1999

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Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

Dear Sir or Madam:

In accordance with § 403(r)(6) of the Federal Food, Drug, and Cosmetic Act, and pursuant to 21 C.F.R. § 101.93, Columbia Laboratories, Inc., hereby provides the following notice with regard to the marketing of a Legatrin® GCM Formula™.

The distributor is:

Columbia Laboratories, Inc.
2875 Northeast 191 Street, Suite 400
Aventura, Florida 33180

The label or labeling contain the following statements:

"Nutritionally supports healthy joint function"

"... provides an important nutritional approach for healthy joints and cartilage"

"... supports joint lubrication which is a factor in promoting joint health and mobility"

"... helps you maintain healthy, mobile joints and cartilage"

"... a dietary supplement for healthy joints"

"... an innovative way to nurture the health of your joints and connective tissue"

"... nourishes and helps to replenish cartilage over time to nurture the health of your joints"

"... to support joint and cartilage health"

"Nurture the health of your joints"

LET 4548

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2875 Northeast 191 Street
Suite 400
Aventura, Florida 33180

TEL: 305-933-6089
FAX: 305-933-6090

"Glucosamine and Chondroitin may help maintain the lubricating fluid in joints and cartilage for joint comfort because the lubricating fluid acts as a 'shock absorber,' cushioning joining bones."

"Glucosamine (as the sulfate) is a naturally occurring amino sugar that is one of the human body's basic building blocks for the production of cartilage, synovial fluid and other connective tissues such as tendons and ligaments."

"Glucosamine helps your joints obtain the cushioning support that 'shock-absorbing' cartilage provides."

"MSM (methylsulfonylmethane) is a natural form of the sulfur required for the building blocks of collagen, a critical component of joints and connective tissue."

"MSM (methylsulfonylmethane) is also one of the major building blocks of glycosaminoglycans which, along with glucosamine, are key structural components of cartilage."

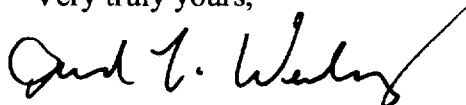
"MSM provides the body with a natural form of sulfur, which is used in the creation of collagen and connective tissue."

"Chondroitin complex, a long chain of hyaluronic acids, is a joint nutrient that, in conjunction with glucosamine and MSM (methylsulfonylmethane), is also a key component of healthy joint function."

"Specifically, the chondroitin complex plays a role in the maintenance of synovial (joint) fluid and lubrication to help keep joints well-cushioned."

To the best of my knowledge, the information contained in this notice is complete and accurate, and Columbia Laboratories, Inc., has substantiation that the statements are truthful and not misleading.

Very truly yours,

A handwritten signature in black ink, appearing to read "David L. Weinberg", with a long, sweeping horizontal stroke extending to the right.

David L. Weinberg
Vice President and CFO